

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
Irving H. Picard
David J. Sheehan
Seanna R. Brown
Heather R. Wlodek

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO APPLICATIONS FOR
INTERIM COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
BY APPLICANTS FROM AUGUST 1, 2022 THROUGH NOVEMBER 30, 2022**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff
Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll
and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his

undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On February 28, 2023, the Trustee filed the Applications for Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred by Applicants from August 1, 2022 through November 30, 2022 (the “Fee Applications”). These Fee Applications include the following:

- A. Forty-First Application of Trustee and Baker & Hostetler LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from August 1, 2022 through November 30, 2022 for Baker & Hostetler, L.L.P., Trustee's Attorney, period: 8/1/2022 to 11/30/2022, fee: \$38,098,225.98, expenses: \$312,692.55 (Filed: 2/28/2023) [ECF No. 22957]
- B. Application of Schiltz & Schiltz as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2022 through November 30, 2022 for Schiltz & Schiltz, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$34,178.46, expenses: \$4,143.85 (Filed: 2/28/2023) [ECF No. 22958]
- C. Application of Soroker Agmon Nordman as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2022 through November 30, 2022 for Soroker Agmon Nordman, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$329,858.36, expenses: \$0.00 (Filed: 2/28/2023) [ECF No. 22959]
- D. Application of UGGC & Associes as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2022 through November 30, 2022 for UGGC & Associes, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$14,472.42, expenses: \$0.00 (Filed: 2/28/2023) [ECF No. 22960]
- E. Application of Browne Jacobson, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2022 through November 30, 2022 for Browne Jacobson, LLP, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$13,102.45, expenses: \$16,824.93 (Filed: 2/28/2023) [ECF No. 22961]
- F. Application of Alpeggiani Studio Legale Associato as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2022 through November 30, 2022 for Alpeggiani Studio Legale Associato, Special Counsel, period: 8/1/2022

to 11/30/2022, fee: \$2,011.15, expenses: \$111.29 (Filed: 2/28/2023) [ECF No. 22962]

- G. Fortieth Application of Windels Marx Lane & Mittendorf, LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from August 1, 2022 through November 30, 2022 for Windels Marx Lane & Mittendorf, LLP, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$3,428,190.50, expenses: \$30,196.89 (Filed: 2/28/2023) [ECF No. 22963]
- H. Application of Kugler Kandestin, L.L.P. as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2022 through November 30, 2022 for Kugler Kandestin, L.L.P., Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$71,132.04, expenses: \$1,238.56 (Filed: 2/28/2023) [ECF No. 22964]
- I. Application of Monfrini Bitton Klein as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2022 through November 30, 2022 for Monfrini Bitton Klein, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$126,683.95, expenses: \$2,424.80 (Filed: 2/28/2023) [ECF No. 22965]
- J. Fourth Application of Bowman and Brooke LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2022 through November 30, 2022 for Bowman and Brooke, LLP, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$13,319.50, expenses: \$3,587.80 (Filed: 2/28/2023) [ECF No. 22966]
- K. Application of Velitor Law as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from August 1, 2022 through November 30, 2022 for Velitor Law, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$912.60, expenses: \$0.00 (Filed: 2/28/2023) [ECF No. 22967]
- L. First Application of Holland & Hart LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from September 7, 2022 through November 30, 2022 for Holland & Hart LLP, Special Counsel, period: 9/7/2022 to 11/30/2022, fee: \$19,418.40, expenses: \$1,522.00 (Filed: 2/28/2023) [ECF No. 22968]
- M. Application of Werder Vigano as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from August 1, 2022 through November 30, 2022 for Werder Vigano, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$3,680.33, expenses: \$99.63 (Filed: 2/28/2023) [ECF No. 22969]

- N. Thirty-Sixth Application of Young Conaway Stargatt & Taylor, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from August 1, 2022 Through November 30, 2022 for Young Conaway Stargatt & Taylor, LLP, Special Counsel, period: 8/1/2022 to 11/30/2022, fee: \$447,666.75, expenses: \$4,010.95 (Filed: 2/28/2023) [ECF No. 22970]

2. The deadline for filing objections to the Fee Applications expired on March 30, 2023 at 4:00 p.m. A hearing on the Fee Applications has been scheduled for April 19, 2023 at 10:00 a.m.

3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-1789 (SMB), ECF No. 4560) (the "Notice Order"), notice of hearing on the Fee Applications was provided by U.S. Mail postage prepaid or email to: (i) all parties included in the Master Service List as defined in the Notice Order; (ii) all parties that filed a notice of appearance in this case; (iii) the SEC; (iv) the IRS; (v) the Acting United States Attorney for the Southern District of New York; and (vi) SIPC.

4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Fee Applications appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Fee Applications.

5. An electronic copy of the proposed order (the "Order") that is substantially in the form of the proposed order that was annexed to the Fee Applications will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: April 3, 2023
New York, New York

By: /s/ David J. Sheehan
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Tel: (212) 589-4200
Fax: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Seanna R. Brown
Email: sbrown@bakerlaw.com
Heather R. Wlodek
Email: hwlodek@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard, Trustee for
the Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff*